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17 *Attorneys for Plaintiff CITY OF OAKLAND*

18 [Additional Counsel Listed on Signature Page]

19 **UNITED STATES DISTRICT COURT**

20 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

21 CITY OF OAKLAND,

22 Plaintiff,

23 v.

24 THE OAKLAND RAIDERS, A  
 25 CALIFORNIA LIMITED PARTNERSHIP;  
 26 ARIZONA CARDINALS FOOTBALL CLUB  
 27 LLC; ATLANTA FALCONS FOOTBALL  
 28 CLUB, LLC; BALTIMORE RAVENS  
 LIMITED PARTNERSHIP; BUFFALO  
 BILLS, LLC; PANTHERS FOOTBALL,  
 LLC; THE CHICAGO BEARS FOOTBALL  
 CLUB, INC.; CINCINNATI BENGALS,

CASE NO. 3:18-cv-07444-JCS

**JOINT CASE MANAGEMENT  
STATEMENT**

Date: July 19, 2019

Time: 9:30 a.m.

Crtrm.: G - 15th Floor

Trial Date: August 2, 2021

1 INC.; CLEVELAND BROWNS FOOTBALL  
 2 COMPANY LLC; DALLAS COWBOYS  
 3 FOOTBALL CLUB, LTD.; PDB SPORTS,  
 4 LTD.; THE DETROIT LIONS, INC.; GREEN  
 5 BAY PACKERS, INC.; HOUSTON NFL  
 6 HOLDINGS, LP; INDIANAPOLIS COLTS,  
 7 INC.; JACKSONVILLE JAGUARS, LLC;  
 8 KANSAS CITY CHIEFS FOOTBALL  
 9 CLUB, INC.; CHARGERS FOOTBALL  
 10 COMPANY, LLC; THE RAMS FOOTBALL  
 11 COMPANY, LLC; MIAMI DOLPHINS,  
 12 LTD.; MINNESOTA VIKINGS FOOTBALL,  
 13 LLC; NEW ENGLAND PATRIOTS LLC;  
 14 NEW ORLEANS LOUISIANA SAINTS,  
 15 LLC; NEW YORK FOOTBALL GIANTS,  
 16 INC.; NEW YORK JETS LLC;  
 17 PHILADELPHIA EAGLES, LLC;  
 18 PITTSBURGH STEELERS LLC; FORTY  
 19 NINERS FOOTBALL COMPANY LLC;  
 20 FOOTBALL NORTHWEST LLC;  
 21 BUCCANEERS TEAM LLC; TENNESSEE  
 22 FOOTBALL, INC; PRO-FOOTBALL, INC.;  
 23 and THE NATIONAL FOOTBALL  
 24 LEAGUE,

25 Defendants.

26 The parties to the above-entitled action jointly submit this Joint Case Management  
 27 Statement in advance of the Case Management Conference set for July 19, 2019 at 9:30 a.m. or as  
 28 soon thereafter as this matter may be heard.

1 **1. Defendants' Motion to Dismiss**

2 On March 1, 2019, Defendants filed a Motion to Dismiss (Dkt. 41). The Motion is fully  
 3 briefed and is set to be heard on July 19, 2019 at 9:30 a.m. – concurrently with the Case  
 4 Management Conference. *See* Dkts. 43, 50.

5 **2. Discovery**

6 At the March 22, 2019 Initial Status Conference, the Court permitted the parties to engage  
 7 in limited discovery. The Parties have met and conferred regarding a Stipulation and [Proposed]  
 8 Order Regarding the Protocol for the Production of Electronically Stored Information and Hard  
 9 Copy Documents and a [Proposed] Stipulated Protective Order Regarding the Disclosure and Use  
 10 of Discovery Materials and submit said documents for the Court's approval concurrently herewith.

Further, Plaintiff has served Requests for Production of Documents on Defendants The Oakland Raiders and National Football League. Defendant The Oakland Raiders has served the same on Plaintiff. The engaged parties have each served objections and responses to the requests and the meet and confer process is under way. Pursuant to the Local Rules, the engaged parties have each made initial offers of production.

While there are no discovery disputes that require the Court's attention at this time, the Parties seek clarification from the Court regarding the timing of production. It is Plaintiff's position that production of these documents (for some of which, in Plaintiff's view, there is no associated burden) should begin immediately. It is Defendants' position that no production should occur until the Motion to Dismiss and any potential future motions to dismiss on amended complaints are decided.

### 3. Scheduling

After considering the positions of the Parties, the Court set the following Schedule at the March 22, 2019 Initial Case Management Conference:

<i>Event</i>	<i>Date</i>
Initial Round of Document Demands and Responses (Plaintiff, NFL and Oakland Raiders)	July 19, 2019 – Motion to Dismiss Hearing
Non-Expert Discovery Cutoff	June 30, 2020
Plaintiff Expert Disclosures	July 30, 2020
Defendants' Expert Disclosures	September 30, 2020
Plaintiff Expert Reports Due	July 30, 2020
Defendants' Expert Reports Due	September 30, 2020
Expert Rebuttal Disclosures	October 30, 2020
Expert Discovery Cutoff	November 30, 2020
Dispositive Motions To Be Filed	January 15, 2021
Reply to Dispositive Motions	February 5, 2021
Hearing re Dispositive Motions	March 5, 2021 @ 9:30 a.m.

<i>Event</i>	<i>Date</i>
To Be Filed: (1) Jointly Proposed Final Pretrial Order (2) Joint Set of Proposed Instructions on Substantive Issues (3) Joint Set of Voir Dire Questions (4) Submit Motions in Limine (5) Trial Briefs (6) Proposed Verdict Forms	June 9, 2021
Opposition to Motions in Limine	June 18, 2021
File Motions in Limine (Pair)	June 18, 2021
Serve Objections to Exhibits	June 29, 2021
Pretrial Conference	July 9, 2021 @ 2:00 p.m.
Trial	August 2, 2021 @ 8:30 a.m.

### 3. Other

The parties have no other matters to bring before the Court at this time.

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1 DATED: July 12, 2019

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3 By: /s/ Maria Bee

MARIA BEE

By: /s/ James W. Quinn

JAMES W. QUINN

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DATED: July 12, 2019

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**ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(i)(3)**

Pursuant to Civil Local Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the signatories hereto.

By: /s/ Michael H. Pearson  
MICHAEL H. PEARSON

*Attorney for Plaintiff City of Oakland*